

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re

BK RACING, LLC,

Debtor.

Chapter 11

Case No. 18-30241

**MOTION FOR ADMISSION *PRO HAC VICE* FOR ANNEMARIE DiNARDO CLEARY**

I, David M. Schilli, am a partner with the law firm of Robinson, Bradshaw & Hinson, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Annemarie DiNardo Cleary to practice in this Court for the purpose of representing Union Bank & Trust, a secured creditor of Debtor BK Racing, LLC, in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Ms. Cleary is a Member of the law firm of Eckert Seamans Cherin & Mellott, LLC, with her office located at, and a mailing address of, 919 East Main Street, Suite 1300, Richmond, Virginia 23219. Ms. Cleary telephone number is (804) 778-7740, and her facsimile number is (804) 698-2950. Ms. Cleary’s e-mail address is [acleary@eckertseamans.com](mailto:acleary@eckertseamans.com).

2. As stated in the Declaration of Annemarie DiNardo Cleary, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Cleary is a member in good standing of the Virginia State Bar (admitted in 1988, having Virginia State Bar No. 28704) and is admitted to practice in the United States Bankruptcy Court for the Eastern District of

Virginia, the United States District Court for the Eastern and Western Districts of Virginia and the United States Courts of Appeal for the Fourth Circuit. Further, Ms. Cleary is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

3. With reference to all matters incident to this case, Ms. Cleary submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of this chapter 11 case.

4. The \$281.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Annemarie DiNardo Cleary to appear before the Court *pro hac vice* in this case.

Dated: February 20, 2018  
Charlotte, North Carolina

Respectfully submitted,

/s/ David M. Schilli

David M. Schilli (NC Bar No. 17989)

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ATTORNEYS FOR UNION BANK & TRUST